

Application Serial No. 10/787,499  
Reply to Office Action of April 18, 2005

PATENT  
Docket: CU-3609

### REMARKS/ARGUMENTS

Reconsideration is respectfully requested.

Claims 1-12 are pending in the present application before this amendment.

By the present amendment, the Claim 1 has been amended. No new matter has been added.

In the Office Action, Claim 1 stands rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,218,214 (Panchou). Claims 1, 3, and 12/1 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,208,521 (Nkatsuka) in view of Panchou. The "et al." suffix, which may appear after a reference name, is omitted in this paper.

Applicant respectfully disagrees.

The claim substrate such as that shown in FIG. 15 of the present application is formed by bending along the boundaries as shown in FIG. 9 so that the **three area 121, 122, 123** of the substrate would surround **--three sides of the multi-chip package--**. As clearly shown in FIGS. 11-13 and 15, because the substrate is bent to form three surfaces, only the **three sides** of the multi-chip packages can be surrounded. To emphasize more this aspect of the present invention, Claim 1 has been amended to recite:

— a circuit substrate consisting of first, second, and third areas wherein the circuit substrate is bent so that the first, second, and third areas surround three sides of the multi-chip package —

Panchou is incapable of teaching this (and other) claimed structures.

Panchou teaches "layers 10a-e of green tape" as shown in FIGS. 1-2 where each layer are cut out in the middle (see first cutout 12, larger cutout 16) in different

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proportions to allow formation of "ledges" such as 14 and 18. These layers 10a-e to having different proportions are stacked on top of each other so as to receive a flip chip within each cutout where a flip chip rests on the ledge such as 14 in FIGS. 1-2 of Panchou.

First, Panchou fails to teach the claimed substrate that is bent to form the first, second, and third areas.

Second, Panchou teaches surrounding four sides--not three sides--of the flip chips that are stacked inside the cutouts of formed in the middle. Based on the disclosure of the cited Panchou reference, Panchou is just incapable of teaching the claimed circuit substrate that is --bent so that the first, second, and third areas surround three sides of the multi-chip package--.

Accordingly, Applicant respectfully submits that Claim 1, as amended is in condition for allowance over the cited references.

Claims 2, 4/1, 4/3, 5-11, and 12/11 are indicated as being allowable if they are rewritten in independent form including all limitations of the base claim and any intervening claims.

For the reasons set forth above, Applicant respectfully submits that Claims 1-12 pending in this application either have been allowed or are in condition for allowance. This amendment is considered to be responsive to all points raised in the Office Action. Accordingly, Applicant respectfully requests a Notice of Allowance in the next action.

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Should the Examiner have any remaining questions or concerns, the Examiner is encouraged to contact the undersigned attorney by telephone to expeditiously resolve such concerns.

Respectfully submitted,



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W. William Park, Reg. No. 55,523  
Ladas & Parry LLP  
224 South Michigan Avenue  
Chicago, Illinois 60604  
(312) 427-1300